Supreme Court, U. S.
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In the Supreme Court of the United States

OCTOBER TERM, 1974

No. 35, Original

UNITED STATES OF AMERICA,
PLAINTIFF,

v.

STATE OF MAINE, ET AL.,
DEFENDANTS.

REPLY BRIEF FOR THE COMMONWEALTH OF MASSACHUSETTS

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TABLE OF CONTENTS

	Page
Argument	2
I. While the Case, as Presently Constituted, Will Not Result in a Delimitation of Actual Boundaries, That Result Can Be Accomplished in an Action Brought by Massachusetts in the United States District Court for the District of Massachusetts.	2
II. Adjudication by the District Court Is the More Appropriate Method of Delimiting the Relevant Baselines.	6
Exhibit A	12

Table of Citations

Cases

Case v. *Bowles*, 327 U.S. 92 (1946)	4
United States v. *Alaska*, 352 F.Supp. 815 (1972), *aff'd* 497 F.2d 1155 (9th Cir. 1974)	5, 7
United States v. *California*, 332 U.S. 19 (1947)	4
United States v. *Louisiana*, 339 U.S. 699 (1950)	4
United States v. *Louisiana*, 363 U.S. 1 (1960)	4
United States v. *Texas*, 339 U.S. 707 (1950)	4
United States v. *Washington*, 233 F.2d 811 (9th Cir. 1956)	4

Statutes

28 U.S.C. § 1251(b)2	4
§ 1345	4
§ 1346(f)	5

	Page
§ 2409(a)	5, 6
43 U.S.C. § 666(c)	6

Miscellaneous

1972 U.S. Code Cong. and Adm. News, 4547	6
"Outer Continental Shelf Oil and Gas Development and the Coastal Zone," National Policy Study prepared by the Senate Committee on Commerce, 93rd Cong. 2d Sess. (1974)	8

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The State of Massachusetts respectfully submits this Reply Brief directed solely to the question of possible further proceedings after decision of the issue now before the Court. While this question is not addressed in plaintiff's brief, the *amicus* brief of the Associated Gas Distributors urges this Court to retain jurisdiction "until all boundary disputes in the Atlantic Outer Continental Shelf are definitively resolved" (p. 10), presumably by further references to a master or masters.

The case at bar, as presently constituted, is concerned with the legal issue of ownership of the continental shelf, and does not encompass the factual delimitation of the seaward limits of inland waters. Massachusetts has

brought an action against the United States, in the United States District Court, to quiet title to the seabed of Massachusetts' inland waters. That action will, of necessity, lead to an adjudication of the precise location of the seaward limits of Massachusetts' inland waters. These boundaries would, in turn, be identical with the baselines from which the continental shelf area in controversy in the case at bar would be delimited, since the seaward limit of inland waters constitutes the relevant "coast line". Thus, irrespective of the nature of the Court's decision in the present case, the boundaries adjudicated by the District Court will serve as the proper geographic basis for the implementation of this Court's decision. While this Court undoubtedly has the authority to expand, after judgment, the parameters of the present controversy in order to establish the precise location of the aforementioned boundaries, we respectfully submit that the United States District Court is by far the more appropriate forum, on a practical basis, to adjudicate the precise and complex factual issues involved. Therefore, we respectfully suggest that this Court should permit the District Court to try the action presently properly before it, and should terminate the case at bar by final decree after ruling on the ownership of the continental shelf.

Argument

I. While the Case, as Presently Constituted, Will Not Result in a Delimitation of Actual Boundaries, that Result Can Be Accomplished in an Action Brought by Massachusetts in the United States District Court for the District of Massachusetts.

The present parameters of the case before this Court do not encompass the problem of delimiting, with geo-

graphical precision, the location of the boundaries between inland waters and the territorial sea. Since these boundaries constitute the "coast line", they would also serve as the relevant "base-lines", the ultimate line of reference with regard to the continental shelf, regardless of which party prevails as to ownership thereof in this Court. The plaintiff in this action is clearly of the same view. In its Brief in Support of Motion for Leave to File Complaint, the plaintiff stated on page 15 that it was seeking a decree which

> "will identify the area in suit by its relationship to the ordinary low-water mark and outer limit of inland waters without determining the physical location of the area on the ground in any particular locality."

On page 18 of its "Brief in Support of Motion for Judgment", the plaintiff stated this proposition even more succinctly: "The critical question here is one of law, not geography . . .". The plaintiff further stated, on that same page, that in its opinion the matter of actual location of baselines had not been joined in issue by the parties in their pleadings. It therefore seems undisputed that, regardless of which side prevails in this lawsuit, the relevant baselines will have to be established at some future date. The question remains how this can best be done. At least as between Massachusetts and the United States, we believe the differences in the respective boundaries claimed are sufficiently significant to warrant an adjudicated result. Two possible modes of adjudication appear feasible: the first is expansion of the present case and referral to a special master or masters after a decree as to ownership of the continental shelf, and the second is a trial in the United States District Court to establish

the required boundaries. We submit that the second alternative is by far the more appropriate.

It is true that in past continental shelf litigation this Court has chosen the first alternative and has retained jurisdiction in order to delimit the precise boundaries involved in "second generation" proceedings. *United States* v. *Louisiana,* 363 U.S. 1 (1960); *United States* v. *Texas,* 339 U.S. 707 (1950); *United States* v. *Louisiana,* 339 U.S. 699 (1950); *United States* v. *California,* 332 U.S. 19 (1947). We submit, however, that that is neither an optimal nor a necessary solution, and that present circumstances are sharply distinguishable from those prevailing at the time the Court adopted this methodology in these previous cases.

The first distinguishing feature is the scope of the present litigation, which includes almost the entire Atlantic coastline. The delimitation of each State's coastline will probably involve widely divergent, complex factual issues as to each State, including historical and other questions. In contrast to the recently concluded hearings before the Special Master in this case, and in contrast to the previous cases, referral to a single master hardly seems feasible or desirable. If, then, the subsequent fact-finding process must, of necessity, be multiple, we suggest that there is no inherent superiority in the situation of several special masters as compared to several district courts.

The second distinguishing feature between the past situations and the present one is the feature of mutuality of remedy. The United States has long had statutory authority to bring suit in the district courts, including actions against a State (which provides the district courts co-extensive jurisdiction with this Court's original jurisdiction in such cases). 28 U.S.C. §§ 1251(b)(2), 1345; *Case* v. *Bowles,* 327 U.S. 92 (1946); *United States* v. *Washington,* 233 F.2d 811 (9th Cir. 1956). The United

States has, in fact, recently availed itself of this option in a situation perfectly analogous to that under consideration here, by bringing a quiet-title action in the District Court against the State of Alaska (presently before this Court upon writ of certiorari) with regard to certain areas claimed as historic inland waters by Alaska. *United States* v. *Alaska,* 352 F. Supp. 815 (1972), *aff'd,* 497 F.2d 1155 (9th Cir. 1974).

Until recently, because of the general doctrine of sovereign immunity, the States did not have the option of bringing such a separate action (as in the *Alaska* case) *against* the United States. In 1972, however, Congress waived sovereign immunity in such quiet-title actions by enacting 28 U.S.C. § 2409(a), and conferred original jurisdiction on the district courts by the enactment of 28 U.S.C. § 1346(f). Thus, for the first time in the history of "continental shelf" litigation in this Court, *both* the United States and the present defendants have the option of availing themselves of quiet-title actions in the District Court. This is a situation analogous to the general equity doctrine of mutuality of remedy. In the previous relevant cases, had this Court terminated the litigation by final decree without provision for demarcation of boundaries, that issue might have remained unresolved indefinitely had the United States declined to bring subsequent actions. This is no longer the case. Today specific boundary cases may be litigated in the district courts at the instance of either the Federal Government or any of the Atlantic States.

With regard to Massachusetts, the mode of relevant District Court adjudication is not merely a credible alternative, but is at present a reality. Massachusetts has, last month, brought an action against the United States, to quiet title to its inland waters, in the United States District Court for the District of Massachusetts (Docket

No. CA-75-188 G). A copy of Massachusetts' complaint is annexed hereto as Exhibit A.

II. Adjudication by the District Court Is the More Appropriate Method of Delimiting the Relevant Baselines.

The statute permitting quiet-title actions against the United States on its face unequivocally includes within its scope the type of lawsuit between Massachusetts and the United States which Massachusetts has instituted. Not only does the wording of the statute apply, but its legislative history indicates that the legislative intent was to permit District Court adjudication in such circumstances. While the legislative history (1972 U.S. Code Cong. and Adm. News, p. 4547), speaks merely, *inter alia,* of the inability of citizens to clear their title by making the United States a party defendant, it is axiomatic that the several States of the Union are members of the class denied a remedy against the United States absent the unequivocal, encompassing words of the statute. It should be noted, moreover, that the statute in question does specifically exclude certain categories of quiet-title actions, and, by cross reference to another statute (43 U.S.C. § 666(c)) touches upon a specific exclusion of actions in this Court involving States as parties. Since the action brought by Massachusetts is not even arguably within the scope of the specific exclusions, we submit that that action is an appropriate one within the general scope of 28 U.S.C. 2409(a).

The United States has thus far not moved the Court to expand this litigation and refer the case to a special master for the delimitation of inland waters, nor has the United States indicated thus far that it would prefer this mode to a trial in the District Court. In any event,

however, the United States could not hereafter argue that the District Court is an inappropriate forum for such a purpose since it has, in the *Alaska* case, *supra,* voluntarily chosen the District Court (as against this Court's originial jurisdiction) in a perfectly analogous controversy.

We submit that the District Court is not only *an* appropriate forum but a *more* appropriate forum than further trial before a special master.

The United States District Court is the general trial court of originial jurisdiction in the system of the United States courts. A suit to quiet title to real property is most efficaciously tried in a court whose function is to evaluate questions of fact and issues of law at the first state of a lawsuit. This Court is, of course, the highest appellate court of the nation. Its rare role as a court of first impression rests upon original jurisdiction on constitutional grounds. This Court's function as a trial court is therefore purely jurisdictional in origin, and is not predicated upon consideration of maximal efficiency in adjudication and in the administration of justice. The practice of referral by this Court to a special master is a modus operandi, the purpose of which is to reconcile this Court's overwhelming work burden as a final appellate tribunal with those rare cases where it must *necessarily* function as a trial court in protracted cases. Referral to a special master, therefore, is a solution dictated by the circumstances, and is by no means the optimal fashion of trying complex factual issues of first impressions where an alternate trial tribunal exists, as it does here.

Specifically, for example, the District Court is a more efficient forum for dealing with interlocutory equitable matters, such as a motion for a preliminary injunction. The subject matter of the inland waters dispute is such that questions of interlocutory equitable remedies may

very well arise, particularly with respect to surveys for mineral resources and deep core drilling in the disputed area. Massachusetts has twice, during the pendency of the present case, felt itself compelled to move the Court for a preliminary injunction against such activity by the federal government. The issue of exclusive exploration rights and, even more important, the issue of environmental protection of the coastal zone would be presented for Massachusetts with greatly increased magnitude and urgency if such federal activity were threatened in the close, inshore areas which we claim to be our inland waters. For a detailed discussion of the possible environmental impact which would threaten the Massachusetts coastal zone, we refer to "Outer Continental Shelf Oil and Gas Development and the Coastal Zone," National Ocean Policy Study, prepared for the Senate Committee on Commerce, 93d Cong. 2d Sess. (1974).* Barring effective federal-State stipulations to maintain the status quo *pendente lite* (and the record in the present case makes this seem doubtful at best) it is not unrealistic to expect very intense federal-State controversy as to what activity shall be permitted during the pendency of further proceedings.

We submit that the District Court could deal with such eventual interlocutory equitable matters much more expeditiously and efficiently. On cases before this Court under its original jurisdiction, such motions must be presented to, and ruled upon by, the full Court. This rather cumbersome procedure could be obviated only by a prior blanket delegation of this Court's equity powers to the special master, an unusual and drastic step fraught with constitutional complications. In the case of the District Court, however, there would not be this isolation of the

* Ten copies of this document are being lodged with the Clerk of the Court.

forum ruling on a motion from the trier of fact in the case; the United States District Judge is not insulated from the day-to-day factual and evidentiary progress of the case (as is this Court prior to the master's Report) and he can therefore exercise with more assurance, based upon the evolving factual picture, his discretion which is at the heart of a determination of interlocutory equitable matters. Moreover, even if the District Court in turn appointed a master for special or general findings of fact, the District Court could, nevertheless, without difficulty, hear argument on such motions and hear the testimony of witnesses. Such a procedure, quite customary in the district courts, is inherently superior to a determination of complex equitable motions based on affidavits alone.

A further advantage to adjudication in the District Court is suggested: while the decision of the District Court would, of course, be subject to appellate review by the Circuit Court of Appeals, it need be reviewed by this Court only if it sees fit to grant a writ of certiorari. In contrast, in the case of referral to several special masters for several trials, the losing party in each instance would have the right to object to the master's findings in a hearing before this Court. By permitting trial in the district courts, therefore, this Court would maintain the option of ultimately reviewing the results while retaining its discretionary role in controlling its own caseload by ruling on petitions for writ of certiorari.

The District Court action, as presently brought by Massachusetts, does not reach the factual issue of delimiting actual seaward boundaries of State continental-shelf ownership, nor the issue of delimiting lateral State offshore boundaries where necessary. As to the seaward boundaries, once this Court has ruled on the legal principles involved, and once (as we urge) the District Court

has established baselines, delimiting seaward boundaries can be accomplished by cartographers without recourse to litigation between the States and the Federal Government. For example, if the Federal Government prevails here, the seaward boundaries are automatically three miles seaward from the baselines. If the States prevai here, the seaward boundaries are 100 miles seaward from the baselines, with certain qualifications not here material.

As for lateral boundaries, that determination can best be accomplished, in the first instance, by agreement among State Commissioners, with subsequent ratification by the United States. In any event, if there are any irreconcilable, unresolved ancillary issues, the United States can seek their resolution by either counterclaiming in the relevant District Court actions or by instituting new ones.

A final comment seems indicated with respect to the timeliness of the adjudication of the disputed baselines. Speedy resolution thereof would seem to be clearly in both the national and the State interest. The course we urge the Court to adopt is designed to resolve the issue most expeditiously. As to the States with respect to which District Court actions have not yet been brought, experience indicates that District Court proceedings are generally more expeditiously resolved than original-jurisdiction cases in this Court where references to special masters are required. As to Massachusetts, even if the United States makes use of the full sixty days in which to answer the State's complaint, the issues in the present District Court action can be fully joined by pleadings, presumably before a decree by this Court. Admittedly, the parties will presumably wish to wait for this Court's decision as to whether the District Court can retain that action before commencing complex discovery proceedings, but the latter could commence forthwith after this Court's decree issues.

Wherefore, the defendant Commonwealth of Massachusetts respectfully prays that the Court, in its decree, terminate this action against it, without expansion of the case in order to delimit baselines, but, rather, that the defendant be permitted to litigate that issue in the currently pending action in the United States District Court.

Respectfully submitted,

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February 13, 1975

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No.

COMMONWEALTH OF MASSACHUSETTS,
PLAINTIFF,
against
UNITED STATES OF AMERICA,
DEFENDANT.

COMPLAINT

THE PLAINTIFF PETITIONS THE COURT TO TRY THIS ACTION *En Banc*

The Commonwealth of Massachusetts, by its Attorney General, brings this suit against the United States of America, and, for its complaint against the defendant, alleges:

1. This action to quiet title to real property is brought against the United States pursuant to the provisions of Title 28 U.S.C. Section 2409a.

2. This Court has exclusive original jurisdiction pursuant to the provisions of Title 28 U.S.C. Section 1346 (f).

3. This action to quiet title to real property is local in nature, and all geographic reference points which delimit the area in controversy are located within the Commonwealth of Massachusetts and within the Judicial District of the United States.

4. The entirety of certain bodies of water encompassed by Massachusetts territory, and known as Massachusetts Bay (including Cape Cod Bay), Nantucket Sound, Vineyard Sound, and Buzzards Bay, have been, and are American waters (as against foreign nations); and they have been,

and are, Massachusetts navigable inland waters (in the federal-state context). These bodies of water have that status by virtue of the applicable international and national law of historic waters (including historic bays) and by virtue of applicable geometric and cartographic principles and techniques, under international and national law, for the delimitation of seaward limits of inland waters ("baselines").

5. The seaward limits of Massachusetts navigable inland waters with respect to the bodies of water set forth in paragraph 4 above (hereinafter collectively the "Claimed Waters") are generally represented by closing lines, ("baselines") drawn between the appropriate termini at headlands enclosing and encompassing the Claimed Waters, specifically:

(a) with respect to Massachusetts Bay, by a baseline drawn between Cape Ann and Cape Cod.

(b) with respect to Nantucket Sound, by baselines drawn from Chatham Outer Beach to the northern point of Monomoy Island; from the southern point of Monomoy Island to the vicinity of Great Point on the Island of Nantucket; from the southwestern point of Nantucket Island to the southeastern point of Esther Island, from the northwestern point of Esther Island to the southeastern point of Tuckernuck Island; from the northwestern point of Muskegut Island to the southeastern point of Chappaquidick Island; and from the southwestern point of Chappaquidick Island to Norton Point on the Island of Martha's Vineyard.

(c) with respect to Vineyard Sound, by a baseline drawn from the northwestern point of the island of Martha's Vineyard to the southwestern point of Cuttyhunk Island;

(d) with respect to Buzzards Bay, by a baseline drawn from the southwestern point of Cuttyhunk

Island, to a point known as Hen and Chickens near the mainland, and from there to the southern point of an area known as Gooseberry Neck on the mainland.

6. A graphic, rather than verbal, description of the seaward limits of the Claimed Waters, is provided by the baselines asserted by Massachusetts super-imposed on a portion of United States Coast and Geodetic Survey chart number 1107, which is attached hereto as Appendix "A" and is incorporated herein by reference. This sketch is provided as a convenience to the Court and the Defendant and does not purport to represent maximal cartographic accuracy attainable on large scale charts.

7. The plaintiff holds title to the shores, subsoil and seabed of the inland navigable waters located within the boundaries of Massachusetts. Said title to said bed of inland waters vested in the plaintiff, one of the Original Thirteen Colonies, after the American Revolution, since the plaintiff at that time became a sovereign state and the successor to the British Crown, which had been the owner of the bed of navigable inland waters located in its American possessions.

8. Plaintiff's title to the bed of inland navigable waters within its boundaries also rests upon colonial grants and charters from the British Crown.

9. The Constitution of the United States does not provide for any transfer of the Massachusetts title to the bed of its navigable inland waters, and, therefore, title thereto remained, and to this day remains, in the plaintiff.

10. By virtue of the passage, in 1953, of the Submerged Lands Act, Public Law 31 of the 83rd Congress, 67 Statutes at Large 29, Title 43 U.S.C. Sections 1301-1315, the defendant recognized and acknowledged the plaintiff's title to the bed of its navigable inland waters out to their seaward limit (the "coast line").

11. The plaintiff, therefore, has clear and exclusive

title, as against the defendant, to the entirety of the seabed and subsoil (including the natural resources thereof) of the Claimed Waters (hereinafter the "Claimed Seabed"), subject only to defendant's constitutional authority to control and regulate navigation in the Claimed Waters.

12. The defendant has asserted right, title, and interest to the Claimed Seabed by means of:

(a) Causing an ad hoc committee of federal governmental agencies to prepare, and publish in 1971, a series of maps purporting, inter alia, to delimit the seaward boundaries of Massachusetts inland waters in a fashion adverse to, and in conflict with, the claim of title asserted by plaintiff herein.

(b) Asserting, through the United States Geological Survey, the right of defendant to conduct or license seismic surveys and core sampling tests for locating mineral resources in areas including the Claimed Seabed, such asserted right by defendant being adverse to the exclusive right to conduct or proscribe surveys for mineral resources which is an important benefit of the title claimed by plaintiff.

13. As a result of the defendant's assertions adverse to plaintiff's rights:

(a) There is a serious cloud upon plaintiff's title to the Claimed Seabed;

(b) Plaintiff's right to the exclusive exploration for mineral resources in the Claimed Seabed is constantly threatened, and with the accelerating pace of relevant activity by defendant, such threats may greatly increase in the immediate future.

(c) The marketability of any of plaintiffs' exploration or exploitation rights with respect to the Claimed Seabed is significantly impaired during the existence of the cloud on plaintiff's title.

(d) The Plaintiff's ability to protect its marine en-

vironment and the existent marine ecosystems is significantly attenuated and circumscribed.

(e) The formulation and implementation of any coherent Massachusetts coastal zone management program is problematical, if not impossible.

In view of the immense economic and environmental significance of this action, and of the important issues of the federal-state relationship presented, the plaintiff respectfully petitions the Court to sit *en banc* in the trial of this case.

WHEREFORE, the plaintiff respectfully prays:

(1) that the Court adjudge, order, and decree that the plaintiff has exclusive title, free and clear of any adverse claims by defendant, to the seabed and subsoil (including the natural resources thereof) of the entirety of the Massachusetts inland waters more particularly described in paragraphs 4 and 5 of the Complaint; and

(2) for such other and further relief as this Court may deem just and proper.

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APPENDIX "A"

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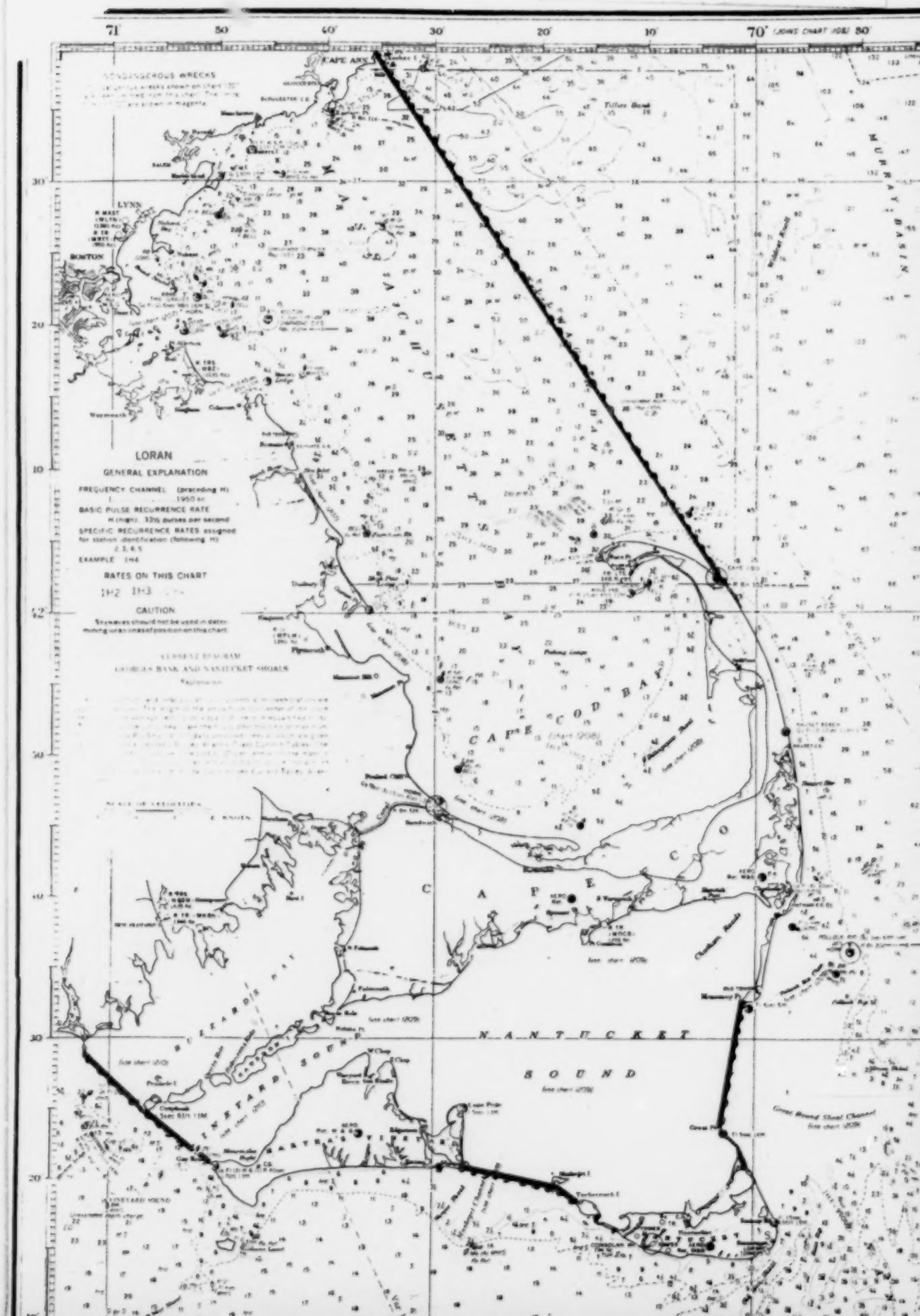

Lineup of past lease sales in gulf

Federal waters
Louisiana
Wildcat sales

Date	No. tracts offered	Acres offered	No. tracts leased	Acres leased	Bonus paid	Av. price per ac.	Bids received	OCS-G numbers
*	270	997,674	270	997,674	—	—	—	008-0381
Oct. 13, 1954	199	748,000	90	394,721	$ 116,378,676	$ 294	327	0405-0491
July 12, 1955	171	658,095	94	252,806	100,091,264	396	351	0520-0611
Feb. 24, 1960	288	1,113,223	99	464,046	246,909,784	532	339	0750-0874
March 1962	781	3,583,541	401	1,879,527	645,033,862	237	1,194	0897-1318
June 13, 1967	206	971,489	158	744,456	510,079,178	685	742	1507-1678
Dec. 15, 1970	127	593,482	118	551,398	845,877,860	1548	1,043	1993-2119
Sept. 12, 1972	78	366,583	62	290,320	385,827,925	2018	324	2140-2213
Dec. 19, 1972	132	864,026	116	535,874	1,665,519,631	3108	690	2217-2334
March 20, 1974	206	930,918	91	421,218	2,092,510,854	4967	402	2338-2443
Total	2,458	10,432,196	1,499	6,532,040	6,606,230,954	—	—	—

Drainage sales

Aug. 11, 1959	36	81,813	19	38,820	$ 84,055,121	$2268	50	0680-0698
Oct. 9, 1962	56	33,855	9	16,178	43,887,351	2713	26	1324-1337
April 28, 1964	28	34,028	23	32,674	60,340,626	1847	69	1351-1373
Mar. 20, 1966	18	25,993	17	25,056	88,845,963	3534	64	1435-1452
Oct. 18, 1966	52	227,896	26	104,717	99,164,930	947	79	1469-1500
Nov. 19, 1968	26	46,824	16	29,679	149,868,789	5050	58	1858-1878
Jan. 14, 1969	38	96,389	20	48,504	44,087,339	908	40	1879-1904
Dec. 16, 1969	27	93,764	16	60,153	66,908,196	1112	38	1959-1968
July 21, 1970	34	75,360	19	44,642	97,769,013	2190	39	1970-1990
Nov. 4, 1971	18	95,872	11	57,222	96,304,523	2587	33	2125-2136
June 19, 1973	5	20,000	4	20,000	53,901,709	2695	12	2435-2439
Total	305	884,796	178	467,646	889,063,567	—	—	—
Grand Total	2761	11,236,932	1677	6,999,686	7,497,294,521	—	—	—

*Leases awarded by state prior to federal jurisdiction

Results of sales since 1947

Date	No. of tracts	Acres presently in force (%)	Bonus presently in force (%)	Platforms installed	Fields discovered
*	135	662,682 (66)	—	190	45
Oct. 13, 1954	38	154,034 (39)	57,400,875 (49)	54	11
July 12, 1955	19	78,112 (31)	54,625,318 (37)	22	9
Feb. 24, 1960	43	294,739 (64)	165,524,650 (67)	71	17
March 1962	190	901,461 (48)	271,337,413 (61)	142	71
June 13, 1967	90	333,866 (45)	333,796,681 (69)	33	21
Dec. 15, 1970	112	526,398 (95)	837,346,785 (99)	48	28
Sept. 12, 1972	62	290,320 (100)	583,827,925 (100)	4	3
Dec. 19, 1972	115	531,313 (99)	1,664,586,631 (100)	5	3
March 20, 1974	91	421,218 (100)	2,092,510,854 (100)	—	—
Total	938	4,194,143 (64)	6,085,049,131 (92)	544	208

Drainage sales

Aug. 11, 1959	8	11,363 (28)	67,949,817 (77)	4	1
Oct. 9, 1962	5	8,391 (32)	34,947,550 (79)	5	—
April 28, 1964	19	21,532 (46)	55,485,335 (92)	9	—
March 20, 1966	11	25,540 (73)	75,805,274 (85)	6	1
Oct. 18, 1966	15	69,850 (63)	72,567,066 (73)	11	1
Nov. 19, 1968	8	14,520 (49)	128,906,259 (86)	7	—
Jan. 14, 1969	13	32,265 (87)	19,277,617 (44)	4	—
Dec. 16, 1969	14	30,592 (84)	66,483,778 (99)	3	1
July 21, 1970	19	44,642 (100)	97,796,013 (100)	8	1
Nov. 4, 1971	11	57,222 (100)	96,304,523 (100)	2	1
June 19, 1973	4	20,000 (100)	53,901,709 (100)	—	—
Total	121	331,899 (71)	769,357,741 (87)	59	6
Grand Total	1067	4,526,044 (68)	6,854,406,872 (91)	603	215

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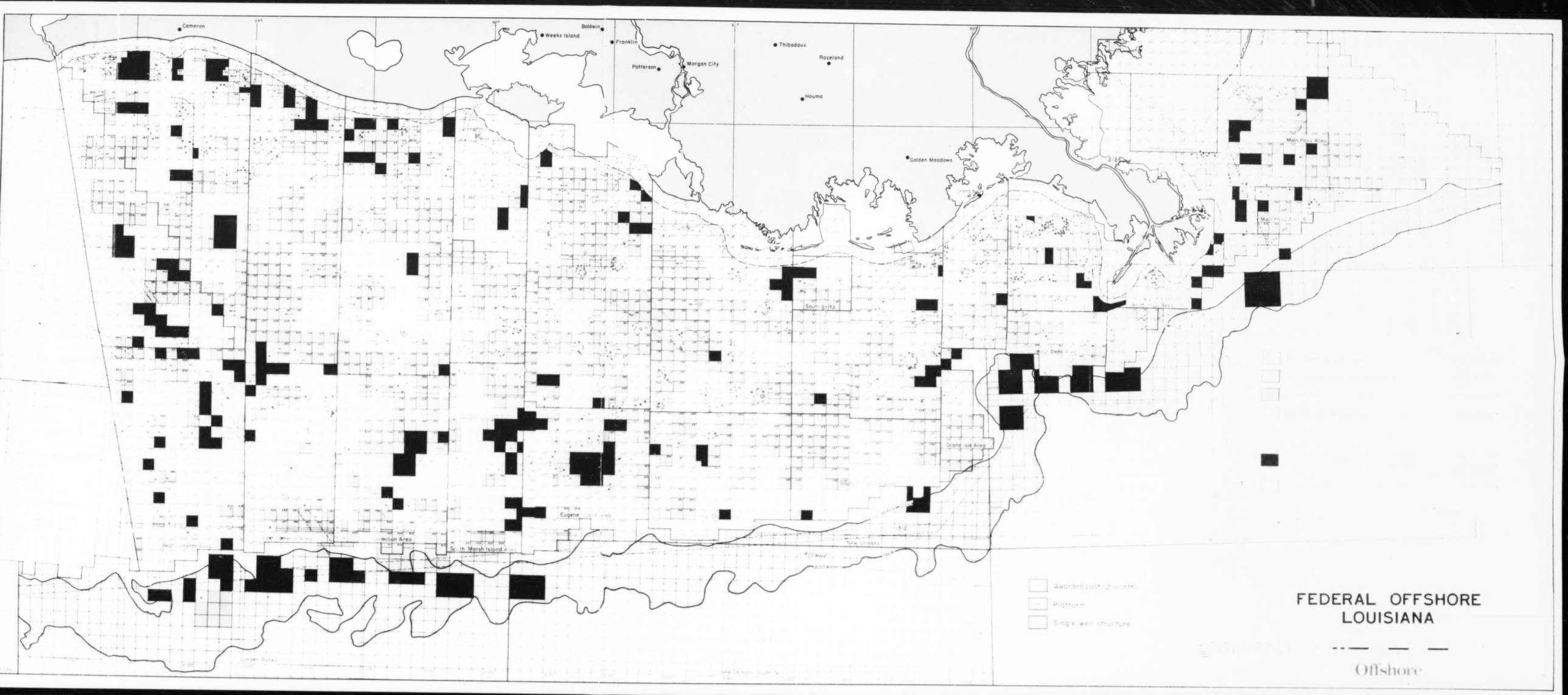
Cameron
Weeks Island
Baldwin
Franklin
Patterson
Morgan City
Thibodaux
Raceland
Houma
Golden Meadows
Main Pass Area
South Pelto
Grand Isle Area
Eugene
Awarded tract (2 months)
Platform
Single well structure
FEDERAL OFFSHORE
LOUISIANA
Offshore

Lineup of past lease sales in gulf

Date	No. tracts offered	Acres offered	No. tracts leased	Acres leased	Bonus paid	Av. price per ac.	Bids received	OCS-G numbers
*	93	122,080	93	125,090	—	—	—	001
Nov. 9, 1954	38	181,778	37	67,249	$ 28,337,029	$ 348	20	0098-0518
July 12, 1955	29	149,760	27	149,760	8,437,462	56	33	0614-0640
Feb. 26, 1960	97	437,160	48	250,280	35,732,031	189	105	0702-0749
March 16, 1962	30	99,720	10	24,800	557,720	19	10	1109-1118
May 21, 1968	169	728,351	110	541,304	993,899,046	1097	454	1711-1851
June 19, 1973	124	672,643	96	521,173	1,577,495,671	2325	599	2336-2434
Total	580	2,316,313	421	1,679,356	2,599,478,959	—	1,333	—

*Leases awarded by state prior to federal jurisdiction

Results of sales since 1947

Federal waters
Texas

Date	No. of tracts	Acres presently in lease (%)	Bonus presently in force (%)	Platforms installed	Fields discovered
*	1	4,320 (80)	—	2	1
Nov. 9, 1954	0	11,700 (17)	$ 12,408,764 (33)	3	1
July 12, 1955	0	0 (0)	— (10)	—	—
Feb. 26, 1960	9	29,340 (12)	18,728,529 (52)	1	2
March 16, 1962	0	0 (0)	— (0)	—	—
May 21, 1968	25	132,174 (29)	228,747,775 (39)	6	6
June 19, 1973	86	522,133 (100)	1,237,495,271 (100)	—	8
Total	121	694,267 (41)	1,797,380,749 (82)	12	

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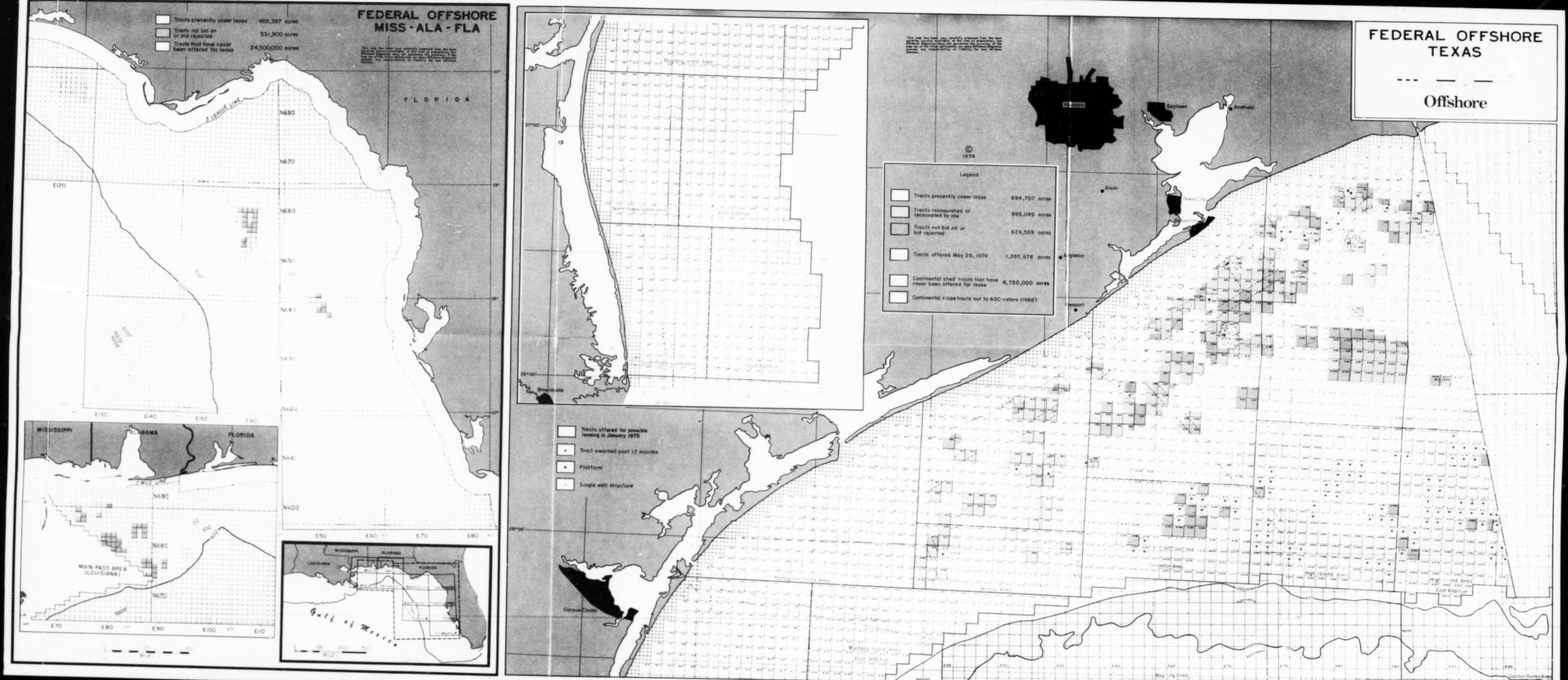
FEDERAL OFFSHORE
MISS - ALA - FLA
Tracts presently under lease 485,397 acres
Tracts not bid on or bid rejected 331,900 acres
Tracts that have never been offered for lease 24,500,000 acres
FLORIDA
3 LEAGUE LINE
MISSISSIPPI
ALABAMA
FLORIDA
3 MILE LINE
MAIN PASS AREA (LOUISIANA)
Gulf of Mexico
FEDERAL OFFSHORE
TEXAS
Offshore
© 1974
Legend
Tracts presently under lease 694,707 acres
Tracts relinquished or terminated by law 985,049 acres
Tracts not bid on or bid rejected 626,559 acres
Tracts offered May 29, 1974 1,355,678 acres
Continental shelf tracts that have never been offered for lease 6,750,000 acres
Continental slope tracts out to 600 meters (1968)
Tracts offered for possible leasing in January 1975
Tract awarded past 12 months
Platform
Single well structure
Houston
Baytown
Anahuac
Alvin
Angleton
Freeport
Brownsville
Corpus Christi
Galveston Area
High Island Area
East Addition
Bay City Area
Garden Banks Area